

Remarks

This application has been carefully reviewed in light of the Office Action mailed March 3, 2009. At the time of the Office Action, claims 1-29 were pending in the application. In the Office Action, claims 1-29 were rejected. By this paper, Applicants have amended claims 1, 4, 6, 9-14, 16-24, 26 and 28, and have cancelled claim 25 to clarify the subject the matter in which the Applicants claim as their invention and to advance prosecution of this case. No new matter has been introduced by this Amendment. Applicants do not admit that the amendments are necessary as a result of any cited art or Examiner rejections. Applicants respectfully request reconsideration of the above-identified application in view of the following remarks.

Claims 10, 12 and 25 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Without waiver or prejudice, Applicants have amended claims 10 and 12 and have cancelled claim 25 to remove the phrases cited by the Examiner as being indefinite. Thus, Applicants respectfully request the Examiner to withdraw this rejection.

Claims 1-3, 5-9, 11-16, 19, 22 and 26-29 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Hellbusch et al. (US 20020095321, and hereinafter referred to as Hellbusch). Applicants traverse this rejection because Hellbusch does not teach, expressly or inherently, pending claims 1-3, 5-9, 11-16, 22 and 26-29.

Independent claim 1 is drawn to a method for integrating data to facilitate management of a relationship between a customer and a service or product provider. Claim 1 requires "integrating ... one or more customer vehicle attributes on a VIN-specific level across ... two or more computer systems to obtain one or more VIN-specific customer vehicle attributes." Support for this limitation is found at least in ¶ [0053] of Applicants' specification: "an after vehicle sales delivery relationship between a customer and a service or product provider ... can be managed on a VIN-specific level based on the integration of ... one or more vehicle attributes."

Claim 1 recites integration of customer vehicle data on the VIN-level to facilitate customer relationships. Hellbusch does not teach or suggest the claimed integrated VIN-specific customer vehicle attributes. At best, Hellbusch teaches a physical interconnection between various business entities:

This invention, for the first time, creates a federated system that interlinks multiple company business processes together and allows applications to interact with these processes, through the Enterlink topology. The Enterlink topology is a bus structure where each company has a connection to the bus that enables that company to interact with other companies connected to the bus. Thus, an Enterlink application can integrate with the Enterlink to automate a federated system activity.

paragraph [0010].

For at least this reason, claim 1 is patentable over Hellbusch.

Claims 2, 3, 5-9, 11-16, 19 and 22 are believed to be allowable for at least the same reason as corresponding base claim 1 and further due to the additional features they recite. Separate and individual consideration is respectfully requested. For instance, claim 13 recites "the service appointment system scheduling service appointments based on the one or more VIN-specific customer vehicle attributes." Hellbusch generally describes a service scheduling application. ¶ [0099]. Hellbusch does not provide a further teaching of scheduling service appointments based one or more VIN-specific customer vehicle attributes, as required by pending claim 13. As another example, claim 14 recites "the marketing offer system transmitting service, maintenance offers, or product offers based on the one or more VIN-specific customer vehicle attributes." Hellbusch generally describes "broadcast services that deliver information to a user." ¶ [0123]. Hellbusch does not teach or suggest the claimed step of transmitting service, maintenance offers, or product offers based on one or more VIN-specific customer vehicle attributes. For at least these reasons, Applicants respectfully request the Examiner to withdraw this rejection of claims 2, 3, 5-9, 11-16, 19 and 22.

Claims 26 and 27 require "a retrieval module ... for ... integrating the one

or more customer vehicle attributes on a VIN-specific level across the two or more computer systems to obtain one or more VIN-specific customer vehicle attributes." Hellbusch does not teach or suggest the claimed integrated VIN-specific customer vehicle attributes. At best, Hellbusch teaches a physical interconnection between various business entities. ¶ [0010]. For at least this reason, claims 26 and 27 are patentable over Hellbusch.

Claims 28 and 29 require a "means for integrating the one or more customer vehicle attributes on a VIN-specific level across the two or more computer systems to obtain one or more VIN-specific customer vehicle attributes." Hellbusch does not teach or suggest the claimed integrated VIN-specific customer vehicle attributes. At best, Hellbusch teaches a physical interconnection between various business entities. ¶ [0010]. For at least this reason, claims 28 and 29 are patentable over Hellbusch.

Claims 4, 21 and 23-25 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hellbusch, in view of Gaito (US 200301711942). Applicants traverse this rejection because the proposed combination of Hellbusch and Gaito does not teach or suggest pending claims 4, 21 and 23-25. Pending claims 4, 21 and 23-25 each recite "integrating ... one or more customer vehicle attributes on a VIN-specific level across ... two or more computer systems to obtain one or more VIN-specific customer vehicle attributes." Hellbusch does not teach or suggest this limitation, and Gaito does not make up for this defect of Hellbusch. For at least this reason, claims 4, 21 and 23-25 are patentable over the proposed combination of Hellbusch and Gaito.

Claim 10 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hellbusch and Foegen et al. (US 20050071176, hereinafter referred to as Foegen). Applicants traverse this rejection because the proposed combination of Hellbusch and Gaito does not teach or suggest pending claim 10. Pending claim 10 recites "integrating ... one or more customer vehicle attributes on a VIN-specific level across ... two or more computer systems to obtain one or more VIN-specific customer vehicle attributes." Hellbusch does not teach or suggest this limitation, and Foegen does not make up for this defect of Hellbusch. For at least this reason, claim 10 is patentable over the proposed

combination of Hellbusch and Foegen.

Claims 17 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Hellbusch and the knowledge of one skilled in the art. Applicants traverse this rejection because the proposed combination not teach or suggest pending claims 17 and 18. Pending claims 17 and 18 each recite "integrating ... one or more customer vehicle attributes on a VIN-specific level across ... two or more computer systems to obtain one or more VIN-specific customer vehicle attributes." Hellbusch does not teach or suggest this limitation, and the knowledge of one skilled in the art does not make up for this defect of Hellbusch. For at least this reason, claims 17 and 18 are patentable over the proposed combination.

Claim 20 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Hellbusch and Nelson (US 6922674). Applicants traverse this rejection because the proposed combination of Hellbusch and Nelson does not teach or suggest pending claim 20. Pending claim 20 recites "integrating ... one or more customer vehicle attributes on a VIN-specific level across ... two or more computer systems to obtain one or more VIN-specific customer vehicle attributes." Hellbusch does not teach or suggest this limitation, and Nelson does not make up for this defect of Hellbusch. For at least this reason, claim 10 is patentable over the proposed combination of Hellbusch and Nelson.

Applicants do not acquiesce in the Examiner's characterizations of the art. For brevity and to advance prosecution, Applicants may not have addressed all characterizations of the art and reserve the right to do so in further prosecution of this or a subsequent application. The absence of an explicit response by Applicants to any of the Examiner's positions does not constitute a concession to the Examiner's positions. The fact that Applicants' comments have focused on particular arguments does not constitute a concession that there are not other arguments for patentability of the claims. Applicants submit that all of the dependent claims are patentable for at least the reasons given with respect to the claims on which they depend.

CONCLUSION

Applicants have made a genuine effort to respond to the Examiner's rejections in advancing the prosecution of this case. Applicants believe all formal and substantive requirements for patentability have been met and that this case is in condition for allowance, which action is respectfully requested.

Please charge the amount of \$490 for the two month extension of time fee to Deposit Account No. 02-3978. Please charge any additional fees or credit any overpayments as a result of the filing of this paper to Deposit Account No. 06-1510.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Matthew M. Jakubowski, Attorney for Applicant, at Examiner's convenience at (248) 358-4400.

Respectfully submitted,
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